REMARKS

In response to the Office Action mailed March 29, 2011, the Assignee respectfully requests reconsideration. To further the prosecution of this application, each of the objections and rejections set forth in the Office Action has been carefully considered and is addressed below. The application as presented is believed to be in allowable condition.

I.   Rejections Under 35 U.S.C. §101

The Office Action rejects claims 7-17 under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter. Specifically, the Office Action asserts that the claims purportedly do not require that the method be implemented by a particular machine or transform a particular article (Office Action, page 3). Claim 7 has been amended herein to recite *inter alia*, "examining, **by at least one processor**, at least one source of knowledge ... (emphasis added)." Support for this amendment is found at least at page 11, line 14 of the specification as originally filed.

Claim 7 is directed to statutory subject matter because at least one step of the method is performed by at least one processor. Accordingly, it is respectfully requested that the rejection under 35 U.S.C. §101 be withdrawn. Claims 8-17 depend from claim 7 and each is directed to statutory subject matter for at least the same reasons.

II.   Rejections Under 35 U.S.C. §102

The Office Action rejects claims 1-5, 7-9, 11, 13, and 16 (including independent claims 1, 2, and 7) under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent 6,278,968 ("Franz"). The Assignee respectfully requests reconsideration of the rejections.

A.   Overview of Some Embodiments

Speech recognition and correction systems operate to transcribe spoken text into recognized text and some systems recognize and correct errors within words and word sequences during transcription (Specification, page 1, lines 15-17). The specification evidences an appreciation that conventional systems, which generate a list of alternatives based on acoustic models and language models during recognition may be improved by storing a lexicon of alternatives on a correction

device, such that the correction of texts recognized by a speech recognition system can be carried out in a more simple and rapid manner (Specification, page 3, lines 32-34). Entries in the lexicon of alternatives may be created from one or more sources of knowledge that are independent of an analysis by an acoustic model and a language model of the speech recognition device used during recognition (Specification, page 4, lines 5-8). When a user selects a word, phrase, or word part for correction, the list of alternatives corresponding to the recognized words is accessed from the lexicon of alternatives and the list of alternatives is displayed to the user (Specification, page 8, lines 18-24).

The foregoing summary is provided to assist the Examiner in appreciating some applications for various aspects of the invention. However, this summary may not apply to each of the independent claims, and the language of the independent claims may differ in material respects from the summary provided above. Thus, the Assignee respectfully requests that careful consideration be given to the language of each of the independent claims and that each be addressed on its own merits, without relying on the summary provided above. In this respect, the Assignee does not rely on the summary provided above to distinguish any of the claims over the prior art. Rather, the Assignee relies only upon the arguments provided below.

> B.   Franz Fails to Disclose or Suggest All Limitations of Any of Independent Claims 1, 2, and 7

i. Independent Claim 1

Claim 1 recites *inter alia*, "… a correction device configured to … store a lexicon of alternatives, the lexicon of alternatives comprising a plurality of entries, **wherein the plurality of entries include one or more alternatives determined from one or more sources of knowledge that are independent of an analysis by an acoustic model and a language model used by the at least one speech recognition device during transcription of the spoken text** (emphasis added)." Support for this amendment is found at least at page 3, lines 18-23 of the specification as originally filed. Franz fails to disclose or suggest the above-highlighted portion of claim 1.

The Office Action asserts that the ordered list of utterance hypotheses illustrated in Fig. 12 of Franz is a lexicon of alternatives. However, the hypotheses in the ordered list are not determined

from one or more sources of knowledge that are independent of an analysis by an acoustic model and a language model used by the at least one speech recognition device. Rather, Franz states that the hypotheses are constructed based on a data structure which includes results of recognizing the input speech with at least one word pronunciation dictionary and at least one acoustic model (Franz, col. 16, lines 14-23).

At least because the system of Franz does not disclose or suggest storing a lexicon of alternatives comprising a plurality of entries, wherein the plurality of entries include one or more alternatives *determined from one or more sources of knowledge that are independent of an analysis by an acoustic model and a language model used by the at least one speech recognition device*, claim 1 patentably distinguishes over Franz and it is respectfully requested that the rejection under 35 U.S.C. §102 be withdrawn.

ii. Independent Claim 2

Claim 2 is directed to a correction device and recites, *inter alia*, "a storage device configured to store a lexicon of alternatives comprising a plurality of entries, **wherein the plurality of entries include one or more alternatives determined from one or more sources of knowledge that are independent of an analysis by an acoustic model and a language model used by the speech recognition device** (emphasis added)."

As should be appreciated from the foregoing discussion, the system of Franz does not store a lexicon of alternatives comprising a plurality of entries that include one or more alternatives determined from one or more sources of knowledge that are independent of an analysis by an acoustic model and a language model used by the speech recognition device. Rather, in the system of Franz, alternate candidates for a recognized word are generated based on an acoustic analysis of the input speech by a speech recognition device.

For at least these reasons, claim 2 patentably distinguishes Franz and it is respectfully requested that the rejection under 35 U.S.C. §102 be withdrawn. Claims 3-6 depend from claim 2 and are allowable for at least the same reasons.

iii. Independent Claim 7

Claim 7 recites, "examining, by at least one processor, **at least one source of knowledge that is independent of an acoustic model and a language model used by the speech recognition device,** wherein the at least source of knowledge is examined with respect to text elements, including word parts, words and/or word sequences contained therein that can be confused with one another (emphasis added)."

As should be appreciated from the foregoing discussion, claim 7 patentably distinguishes over Franz and it is respectfully requested that the rejection under 35 U.S.C. §102 be withdrawn. Claims 8-17 depend from claim 7 and are allowable for at least the same reasons.

III. New Claims

Claims 18-20 are newly added to this application. Each of these dependent claims includes limitations that were previously recited in the respective independent claim from which it depends. Each of claims 18-20 is allowable for at least the same reasons as the base claim from which it depends.

IV. General Comments on Dependent Claims

Since each of the dependent claims depends from a base claim that is believed to be in condition for allowance, for the sake of brevity, the Assignee believes that it is unnecessary at this time to argue the further distinguishing features of the dependent claims. However, the Assignee does not necessarily concur with the interpretation of the previously presented dependent claims as set forth in the Office Action, nor does the Assignee concur that the basis for rejection of any of the previously presented dependent claims is proper. Therefore, the Assignee reserves the right to specifically address the further patentability of the dependent claims in the future.

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CONCLUSION

In view of the above amendment, the Assignee believes the pending application is in condition for allowance. A Notice of Allowance is respectfully requested. The Examiner is requested to call the undersigned at the telephone number listed below if this communication does not place the case in condition for allowance.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, the Assignee hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, the Director is hereby authorized to charge any deficiency or credit any overpayment in the fees filed, asserted to be filed, or which should have been filed herewith to our Deposit Account No. 23/2825, under Docket No. N0484.70060US00 from which the undersigned is authorized to draw.

Dated: 6/29/11

Respectfully submitted,

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